



U.S. Department of Justice

United States Attorney  
Southern District of New York

MEMO ENDORSE

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

April 17, 2020

**BY ECF**

The Honorable Kenneth M. Karas  
United States Courthouse  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: **United States v. Lance Clarke, 19-cr-530 (KMK)**

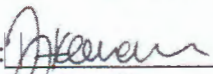
Dear Judge Karas:

On behalf of both parties, the Government respectfully requests a thirty-day adjournment of the April 22, 2020, status conference in the above-referenced case. In view of the measures in place to address the COVID-19 outbreak, including those implemented by the Court and the Government in the Southern District of New York to limit in-person proceedings, and the fact that the parties are discussing a potential disposition of this matter without the need for trial, the Government respectfully submits that an adjournment is appropriate and in the interest of justice.

Should the Court grant the requested adjournment, the Government seeks to exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between April 22, 2020, and the adjournment date. Defense counsel consents to the exclusion of time. The parties submit that the ends of justice served by the exclusion outweigh the best interests of the public and the defendant in a speedy trial to allow the defense to continue reviewing discovery, to allow the parties to discuss a pre-trial resolution, and to protect the public health. Enclosed, please find a proposed order excluding time.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By:   
Lindsey Keenan  
Assistant United States Attorneys  
(914) 993-1907

cc: Daniel A. Hochheiser, Esq. (by ECF)

*granted. The  
conference is  
adjourned to 5/27/20  
at 10:30 am*  
SO ORDERED

  
KENNETH M. KARAS U.S.D.J.

4/17/20